



U.S. Department of Justice

United States Attorney  
Southern District of New York

The Jacob K. Javits Federal Building  
26 Federal Plaza  
New York, New York 10278

April 21, 2025

**BY ECF**

The Honorable Denise L. Cote  
United States District Judge  
Southern District of New York  
Daniel Patrick Moynihan U.S. Courthouse  
500 Pearl Street  
New York, NY 10007

**Re: U.S. v. Valero-Calderon et al., S1 25 Cr. 41 (DLC)**

Dear Judge Cote:

The Government respectfully requests that the Superseding (S1) Indictment in this matter be unsealed and that the Court schedule an arraignment and pretrial conference. The Government also respectfully moves for the exclusion of time under the Speedy Trial Act through April 25, 2025. The exclusion of time is in the interest of justice because it will give the parties an opportunity to appear before the Court to propose a schedule that appropriately balances the importance of a speedy trial with the need for the defense to review the discovery in this racketeering case and consider appropriate motions. 18 U.S.C. § 3161(h)(7)(A).

Respectfully submitted,

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Acting United States Attorney for the  
Southern District of New York

by: /s/  
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**CC (ECF)**

All Counsel of Record

The application to unseal the indictment is hereby GRANTED. The requests to schedule a pretrial conference and exclude time are denied without prejudice to renewal in the event that Judge Cote, to whom this case is assigned, is not available in the next couple of days. SO ORDERED.

Furman

Judge Jesse M.

Part One